



Métis Nation of Ontario
Lands, Resources and Consultations

08 March 2023

Impact Assessment Agency of Canada (IAAC)
c/o Erin Norton, Project Analysis, Ontario Region
22nd Floor, Place Bell
160 Elgin St.
Ottawa ON K1A 0H3

RE: Review of the *Draft Version* Tailored Impact Statement Guidelines for the Crawford Nickel Project dated February 6, 2023

To Erin Norton c/o IAAC,

The Métis Nation of Ontario (MNO) has had the opportunity to review the Impact Assessment Agency of Canada's (IAAC's) Tailored Impact Statement Guidelines (TISG) and Indigenous Engagement and Partnership Plan (IEPP) for the proposed Canada Nickel Company Crawford Nickel Project (the Project). As you are aware, the Project lies within the MNO's Abitibi Inland Historic Métis Community of the regional rights-bearing Métis community as represented by the MNO Region 3 James Consultation Committee (the Regional Consultation Committee).

The MNO's comments are attached to this letter, with summaries provided below for both the TISG and IEPP. The MNO's comments note that substantial research and consultation must be undertaken in order to meet the requirements of the TISG and IEPP. Capacity, in terms of both available MNO staff and funding for studies and reviews, will be the biggest challenge for the MNO to meaningfully participate in this project.

Tailored Environmental Impact Statement Guidelines

For the Métis specific information required by the TISG to be included in the Impact Statement, significant research and substantial collaborative consultation must be undertaken by both the Métis Nation of Ontario ("MNO") and Canada Nickel Company. The Impact Assessment Agency has been clear in presentations to the MNO that they cannot compel proponents to provide funding. It is also clear from the listing of information requirements that, without MNO participation, Canada Nickel Company cannot collect the necessary information about MNO to fulfill the information requirements, as described in the TEISG. Therefore, comprehensive funding is necessary. However, without the Impact Assessment Agency compelling Canada Nickel Company, the funding allocations is firmly within control of Canada Nickel Company and they can scale MNO's involvement at their discretion.

There are some aspects of the TISG which are critical for MNO involvement (e.g., developing a list of Métis rights, comprehensive or otherwise) and some which may require further consideration by MNO to evaluate the value (e.g., expectations for peace and quiet during land use); specific instances are listed below in the table.

There are also numerous components of the Impact Statement which requires review by the MNO (e.g., the proponent's need statement, alternative means of carrying out the project, the record of engagement, confirmation of the results of engagement, the Impact Statement itself, 'concerns deemed important', the Critical Mineral Strategy, and social context indicators) the review of these documents cannot be captured by capacity provided for data collection, assessment, mitigation development and follow-up.

This plan is more general and leaves room for interpretation. There are vague statements which require specific clarification with the Impact Assessment Agency as to the intent. For example, the objectives indicate that there are "Opportunities for collaboration with Indigenous communities assessment of the impacts of the Project on the exercise of Aboriginal or Treaty rights..." this could imply many things. As a result, this needs to be clarified.

The document notes that Agency-led engagement and consultation activities will use a suite of tools and methods including clear information on funding. However, to date, no details on specific funding beyond the preliminary phase has been shared. It would be helpful to advance this so MNO can understand what capacity is required from the proponent.

The document includes positive information such as reference to flexible timelines. This will be key in the process as the MNO is being tasked with significant information gathering requirements via the TISG. However, the MNO will be clearly articulating the established consultation process that it has in place, and will provide it to IAAC to address this ask.

We appreciate the effort IAAC has made to the development of these reports and inclusion of MNO. The MNO looks forward to hearing your response to our comments. Please feel free to contact Victoria Stinson, Lands, Resources and Consultations Branch at <Email address removed> if you would like to discuss the MNO's comments further.

Yours sincerely on behalf of the Region 3 Consultation Committee,

<Original signed by>

Regional Councilor Jacques Picotte
Provisional Council of the Métis Nation of Ontario